

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
2 Including Professional Corporations
P. CRAIG CARDON, Cal. Bar No. 168646
3 DYLAN J. PRICE, Cal. Bar No. 258896
JAY T. RAMSEY, Cal. Bar No. 273160
4 1901 Avenue of the Stars, Suite 1600
Los Angeles, California 90067-6055
5 Telephone: 310.228.3700
Facsimile: 310.228.3701
6 Email: ccardon@sheppardmullin.com
dprice@sheppardmullin.com
7 jramsey@sheppardmullin.com

8 Attorneys for Defendant
KATE SPADE & COMPANY

10 UNITED STATES DISTRICT COURT
11 NORTHER DISTRICT OF CALIFORNIA

13 LAURA MARKS, GAYLIA PICKLES
& DONNA VANDIVER, individually
14 and on behalf of all others similarly
situated,

15 Plaintiffs,

16 v.

17 KATE SPADE AND COMPANY, a
18 Delaware corporation; and DOES 1-50,
inclusive,

19 Defendant.
20

Case No. 3:15-CV-05329-VC

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER CONTINUING FURTHER
CASE MANAGEMENT
CONFERENCE**

1 Pursuant to Local Rules 6-2 and 7-12 and the Honorable Vince Chhabria's
2 Civil Standing Order, defendant Kate Spade & Company ("Kate Spade") and
3 plaintiffs Laura Marks, Gaylia Pickles and Donna Vandiver (collectively,
4 "Plaintiffs" and with Kate Spade, the "Parties"), by and through their counsel,
5 hereby stipulate as follows:

6 WHEREAS, there is a further case management conference currently
7 scheduled for May 17, 2016;

8 WHEREAS, on May 5, 2016, the Court held the hearing on Kate Spade's
9 Motion to Dismiss Plaintiffs' First Amended Complaint Pursuant to Rule 12(b)(6)
10 ("Motion to Dismiss");

11 WHEREAS, leave to amend having been requested by Plaintiffs and granted
12 by the Court at the hearing on Kate Spade's Motion to Dismiss, Plaintiffs' Second
13 Amended Complaint ("SAC") is due on or before May 26, 2016;

14 WHEREAS, as a result of the Court's May 5, 2016 Order granting Plaintiffs
15 leave to amend, there will be no operative complaint pending at the time of the
16 currently scheduled May 17, 2016 further case management conference;

17 WHEREAS, Kate Spade's response to Plaintiffs' SAC will be due on or
18 before June 16, 2016;

19 WHEREAS, pursuant to Local Rule 7-2(a), the hearing on any motion filed
20 by Kate Spade in response to Plaintiff's SAC will occur thirty-five days after the
21 filing thereof (*i.e.*, on or before July 21, 2016).

22 WHEREAS, counsel for the Parties have met and conferred and agreed to
23 continue the further case management conference until a date after any hearing on
24 Kate Spade's response to the SAC would occur (*i.e.*, after July 21, 2016) that is
25 convenient to the Court.

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1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND
2 RESPECTFULLY REQUESTED that the Court continue the May 17, 2016 further
3 case management conference to a date after July 21, 2016 that is convenient to the
4 Court.

5
6 Dated: May 6, 2016 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

7 By /s/ P. Craig Cardon
8 P. CRAIG CARDON
9 Attorneys for Defendant
KATE SPADE AND COMPANY

10 Dated: May 6, 2016

11 MARKUN ZUSMAN FRENIERE & COMPTON

12 By /s/ Mark A. Ozzello
13 MARK A. OZZELLO
14 Attorneys for Plaintiffs
LAURA MARKS AND GAYLIA PICKLES

15 Dated: May 6, 2016

16 WILLIAMSON LAW FIRM, P.C.

17 By /s/ Che' Williamson
18 CHE' WILLIAMSON
19 Attorneys for Plaintiff
DONNA VANDIVER

20
21 **[PROPOSED] ORDER**

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23
24 DATED: May __, 2016

25
26 The Honorable Vince Chhabria
27 United States District Court Judge
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Dated: May 6, 2016 SHEPPARD MULLIN RICHTER & HAMPTON LLP

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